



595 Menlo Drive, Rocklin, CA 95765
Tel 800 900 9478 Fax 888 900 9477

April 18, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Presentation, Consumer & Governmental Affairs Seeks to Refresh the Record
Regarding Misuse of Internet Protocol Relay Service, CG Docket Nos. 12-38 and 03-123

Dear Ms. Dortch:

A staff member of the Commission recently requested that Purple Communications, Inc. (“Purple” or the “Company”) estimate the time needed for the Company to implement process and technological changes necessary to restrict issuance of ten-digit numbers only to those IP-Relay registrants who have completed an identity-verification process.

Purple already requires new registrants to complete an identity-verification process prior to obtaining a ten-digit number. Whether a potential registrant uses AOL Instant Messenger, the web, or a wireless device to register for a new IP-Relay account, Purple requires the registrant to provide his/her name, address, and date of birth. Using Experian’s Precise ID solution, Purple’s system instantly evaluates the identity information provided by the registrant. If the potential registrant’s identification information is validated by Precise ID, the Company issues a ten-digit number to the registrant. If the potential registrant’s identification information cannot be verified through Precise ID, the system directs the potential registrant to contact Purple’s Customer Care department. Then, the potential registrant must furnish additional identification information to Customer Care (e.g. photo identification) before the Company will issue a ten-digit number to the registrant.

Precise ID allows the Company to require additional identification information, including a social security number (in full or in part), instantaneously. Additionally, the Company could require the submission of photo identification through its Customer Care department. Photo identification verification could not be conducted instantaneously with registration. Depending on the type of additional identification criteria mandated by the Commission, Purple likely can implement the required functionalities to support verification of the additional information within three to six weeks from the Commission’s direction.

Purple supports the Commission’s focus on addressing the challenge posed by “guest access.” Absent an industry-wide solution, dial-around functionality exposes the industry to the “lowest common denominator” for registration standards as all providers are required to process traffic from or to a ten-digit number registered with the Neustar database. The heightened verification standards of any one provider do not sufficiently enable that provider to protect the quality of its traffic. Accordingly, concise uniform identity registration and verification requirements and minimum compliance standards are required.



595 Menlo Drive, Rocklin, CA 95765
Tel 800 900 9478 Fax 888 900 9477

Purple is encouraged by the Commission's questions on this topic and welcomes further dialogue as warranted.

Sincerely,

PURPLE COMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "JGL", is positioned above the printed name and title.

John Goodman
Chief Legal Officer

CC: Elliot Greenwald, FCC